

BAYONNE BARREL & DRUM**REPORT #** 56**O.S.C.** JOE COSENTINO
R.M. M.R.ELLIS**DATE:** 12/10/94

DESCRIPTION OF DELIVERY ORDER: Mobilize necessary personnel and equipment to facilitate removal action. Overpack, sample, haz-cat drummed waste on site, to include storage tanks above & below ground, pits, gutters, courtyard and ash/soil piles. Proceed with T & D of drummed waste, rubber, ash/soils and drums related to shredding operations. Further provide any additional support needed to assist with the site removal per the O.S.C.

LOCATION OF WORK: 150 RAYMOND BLVD. NEWARK, NJ 07105

WEATHER: Cloudy**TEMPERATURE:** 40**WORK PERFORMED TODAY BY OHM:**

- * Continued the drum shredding operations today, further separating drums that contain labels "Hazardous Waste" and any other legible manufacturers labels. Weston TAT documents all labels found with this information.
- * Two additional samples from the court yard where taken yesterday by the chemist, the T.A.T. on the dioxin results is 24 days.
- * OHM personnel will be demobilizing from site at 1500 hrs. today.
- * Crew shreds 432 drums today, area secured for week end, personnel demobilize at 1500 hrs.

SUBCONTRACTOR SERVICES PERFORMED:**EXCEPTIONS / UNUSUAL CONDITIONS:**

- * Steve Wilson has approved day off today.

CHANGE IN METHOD OR SCOPE, SPECIFIC DIRECTION RECEIVED FROM OSC:

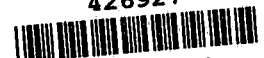
- * O.S.C. issues R.M. one page of 16 items in which combined with Weston T.A.T. has become observations of concern, these items are further discussed with the crew, some items will await discussion with OHM Health & Safety Officer and then alteration of the HASP if necessary.

DOCUMENTS SUBMITTED:**MEETINGS HELD, SUBJECT MATTER, DIRECTION AND OR DECISIONS:**

- * Overview of operations and concerns are further discussed with the OHM Foreman Steve Bank whom will be resuming project oversight in the R.M.s absence.

COMMENTS:

- * M. Ellis will not be on site Mon. 12/12 thru Wed. 12/14, will return Thur. 12/15.



SUBJECT: Site Operations & Safety Concerns.

On December 9, 1994 a list of general concerns was devised and subsequently given to me to further act on. This list contained sixteen items and seven of which were related to Health & Safety issues that I feel have since been addressed to the satisfaction of our office. The solution to this situation I believe was the mobilization of a Health & Safety Officer, this adds a control measure to the every day ongoing tasks in which no doubt have been getting complacent. Although having sustained one O.S.H.A. recordable, it was not directly related to the site work, but rather indirectly. It is my concern that the Health & Safety Officer stay on site for as long as needed to enforce and maintain strict compliance in this area. As you well know the upcoming task of the drum de-heading operation will involve additional personnel and equipment that will further add to the safety concerns on site.

As for the operational concerns, the crew has been well briefed on the following:

- * Thirty minute lunch.
- * Site sign in sign out any time they should enter or depart site and it should be further known that even the E.P.A. Officials have not firmly adhered to this policy.
- * Discussions with McRoberts Security, MR. George Willis, regarding an overlap with the former guard on site, no guard is to leave their post until properly relieved, *OHM to relieve or wait for guard.*
- * As you well know, the estimated daily output based on a twelve hour day was five hundred drums, the daily output has been well over that estimate in only nine and a half hours. Further lets keep in mind that there did exist a couple of days that the drums shredded where over eight hundred but yet neglected there daily maintenance program and was done in ideal conditions, for example, perfect weather, excavator was right on top of drums and was performed early in the start up of the operation with sharper knives.
- * Items eleven and twelve, should time off site be required to perform site related work, OHM will request for the time and approval in advance. Additionally the Response Manager was not expecting to obtain permission from the O.S.C. to allow any crew member personal time off, so long as the position is covered and is done so at no additional cost to the government.

The R.M. out of courtesy will inform the O.S.C. that a personnel change is being made, the reasons for the change may or may not be discussed with the O.S.C. this will be determined on a case by case basis. However should the R.M. be looking to take personal time off, it is up to the discretion of the O.S.C. to decide if a replacement should be needed in his absence.

* Field purchases with the intent of being billed to the project, will be first authorized by the O.S.C. prior to the purchase.

* It is known that any work that does not pertain to the project would be considered non-billable time, however personnel have one hour of time per day which is personal, this time is normally associated to breaks.

* Extraordinary equipment maintenance can be billed if approved by the O.S.C. and C.O. providing equipment was damaged due to site conditions and / or usage directed by the O.S.C. the daily rate shall not be an allowable charge to the contract when the equipment is not available for use. Examples would include scheduled maintenance, breakdowns, repairs and time lost awaiting for parts. The contractor may pro-rate the daily charge at 1/8th the costs of a eight hour day and / or 1/10th the costs for a ten hour day. This is better explained in the contract.

* The CLIN rates that are being used presently are toughs that were given to us from in house, as I understand it, these rates have been previously discussed and loaded into the job prior to its mobilization. Changes in rates can sometimes be held up between the C.O. and E.R.C.S. program management for a number of reasons, as you well know we here in the field have little to do with the rates given and can not be expected to rectify them from this position.

OSC
12-09-94

REC'D 12-15-94
K. Brown

Site Operation and Safety Concerns

Health and safety:

1. Use of proper PPE and proper donning of PPE (i.e. ^{see attached} taping of booties and gloves, use of hoods, splash shields)
2. Delineation of exclusion zone around shredder and bulking tank.
3. ~~Shield on 215.~~
4. ~~Designate a smoking area (if at all).~~
5. ~~Climbing on bulking tank.~~
6. Emergency decon, eye wash and ~~shower near work zone.~~
7. Vehicle use in exclusion zone, and driving habits.

ESTABLISHED

Operations:

7. ~~Lunch is 30 minutes.~~
8. ~~Site sign in/out. Sign in is required by each employee/visitor at their time of arrival. Sign out is required whenever personnel exit the site.~~
9. ~~Security must have overlap with guards, gate to be kept closed.~~
10. ~~Output, it appears that number not hours dictate the crews daily output.~~
11. Time off site requires OSC notification and approval, in advance.
12. Any off-site hours must be justified and approved by the OSC in advance.
13. Field purchases require OSC approval.
14. Non-site related work is not allowed.
15. ~~Equipment repair and maintenance, is not billable under the ERCS contract.~~
16. CLIN rates need to be verified or provisional rates established as per contract requirements.

NOTIFY ONLY
IF BILLABLE

12-16-94

0850H

From: K. Lorene, Health + Safety

To: M. Ellis + OSC Joe Cosentino

Evaluation of OSC safety concerns of
12-9-94.

Kim Hollen

1. It is now accepted that level D modified PPE, (with hourly air monitoring by TAT) is what we're using now. I accept this and observed the crew's procedures on 12-15-94 all day. I found their procedures to be acceptable. They were as follows

- 1) Don D MOD PPE in decon TRL
- 2) DoFF PPE before entering Van to go back to TRL, up front or Decon
- 3) All PPE remained in the HZ
- 4) For now, the Van remained on the grass area but did go down to the shredding area vicinity

2. There has been caution tape placed around the shredder + Bulk tanks. The crews are aware that the Bulk tanks + if need be the shredder are level C areas. Monitoring will determine the need for level C on the shredder + around it. Safety meeting this morning. I told crew they have to better delineate the HZ. This is being done now.

3. I recommend that the wheels remain as they are on the A15. The operator needs to be protected from fugitive liquid leaks as he is dumping into the bulk tank. He also needs to be protected from fugitive emissions during drum unloading. Smoking should only be done in the decon trailer, office trailer or break trailers. 5. There should be no one climbing onto the bulk tanks.

6. During present site operations, I don't believe that an eye wash or emergency decon needs to be moved closer due to the fact that we aren't handling acid or caustic liquids at this time. When such liquids are being handled (i.e. when the drum de handling begins) we will need to address this in some manner. There is an established decon + eye wash on site which I believe is sufficient for emergency decon procedures for 2 mbd

7. For now, however, we have to remain in the area it is in because we need a way to get someone out of there for treatment should a medical emergency arise. This needs to be discussed further.